

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

UNITED STATES OF AMERICA

v.

JEFFREY DOUGLAS COSBY

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Case No.: 3:06cr151-MEF

RESPONSE TO GOVERNMENT'S MOTION FOR DETENTION

COMES NOW Jeffrey D. Cosby, by and through undersigned counsel, Kevin L. Butler, and files his response to the Government's Motion For Detention.

At this time, the defense submits no opposition to the government's Motion For Detention.¹ However, the defendant reserves the right pursuant to 18 U.S.C. § 3142(f) to reopen the detention hearing.

WHEREFORE, the defendant requests the Detention Hearing presently scheduled for June 22, 2006 be vacated until further order of the Court.

Dated this 22nd day of June 2006.

Respectfully submitted,
s/ Kevin L. Butler
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¹ The pleading should not be construed as a "waiver" of detention hearing. Because all of the Mr. Cosby's family and friends reside in Indianapolis, Indiana and the defense has not had time to locate and interview them, undersigned counsel needs additional time to investigate the availability of conditions which may persuade the court release is appropriate.

CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Susan Redmond, Assistant United States Attorney.

Respectfully submitted,

s/ Kevin L. Butler
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